

EXHIBIT 6

In the Matter Of:

USA v

GOOGLE

RAHUL SRINIVASAN

August 29, 2023



1
2 UNITED STATES DISTRICT COURT
3 FOR THE EASTERN DISTRICT OF VIRGINIA

4 -----X
5 UNITED STATES OF AMERICA, et al.,

6
7 PLAINTIFF,

8
9 -against-

10
11 GOOGLE LLC,

12
13 DEFENDANT.

14
15 Civil 1:23-cv-00108

16
17 -----X
18 UNITED STATES DISTRICT COURT
19 SOUTHERN DISTRICT OF NEW YORK

20
21 -----X
22 In Re Google Digital Advertising Antitrust
23 Litigation

24
25 1:21-MD-3010 (S.D.N.Y.)

-----X
CONFIDENTIAL

DEPOSITION OF RAHUL SRINIVASAN

New York, New York

Tuesday, August 29, 2023

Reported by:

Rebecca Schaumloffel, RPR, CLR

JOB #: 2023-909129

Time: 9:05 a.m. Eastern

Page 2

1
 2 A P P E A R A N C E S :
 3
 4 U.S. DEPARTMENT OF JUSTICE
 Antitrust Division
 5 950 Pennsylvania Avenue
 Washington, DC 20530
 6 BY: MICHAEL WOLIN, ESQ.
 MICHAEL FREEMAN, ESQ.
 7
 8
 9
 10 AXINN, VELTROP & HARKRIDER, LLP
 Attorneys for Google
 1901 L Street NW
 11 Washington, DC 20036
 BY: DANIEL VITTEN, ESQ.
 12 SAM SHERMAN, ESQ.
 13
 14
 15
 16 ALSO PRESENT:
 17
 18 Steve Sparling, Esq., in-house,
 Google
 19 Lem Lattimer, Lexitas videographer
 20
 21 ZOOM PARTICIPANTS:
 22
 23 Gabriella Alvarez, Lexitas
 24 * * *
 25

Page 3

1 R. SRINIVASAN
 2 THE VIDEOGRAPHER: We are now on
 3 the record and the time is 9:05 a.m.
 4 This is the video recorded deposition
 5 of Rahul Srinivasan in the matter of
 6 United States et al. versus Google
 7 LLC. Today's date is Tuesday, August
 8 the 29th, 2023.
 9 My name is Lem Lattimer. The
 10 court reporter is Rebecca
 11 Schaumloffel. We are both in
 12 association with Lexitas Legal. All
 13 appearances are noted on the record.
 14 Will the court reporter please
 15 swear in the witness.
 16 RAHUL SRINIVASAN, called as a witness,
 17 having been first duly sworn by a Notary
 18 Public of the States of New York, New
 19 Jersey, and Pennsylvania was examined and
 20 testified as follows:
 21 EXAMINATION BY
 22 MR. WOLIN:
 23 Q. Good morning, Mr. Srinivasan. We
 24 met off the record --
 25 A. Good morning.

Page 4

1 R. SRINIVASAN
 2 Q. -- but my name is Michael Wolin
 3 and I'm an attorney representing the United
 4 States in this matter. I'm joined here today
 5 by my colleague, Michael Freeman, also an
 6 attorney for the United States.
 7 A. Good morning.
 8 MR. BITTON: Do we need to state
 9 appearances? No?
 10 Okay. Sorry.
 11 Q. Mr. Srinivasan, could you please
 12 state your full name for the record?
 13 A. Rahul Srinivasan.
 14 Q. Are you represented by counsel
 15 here today?
 16 A. Yes, I am.
 17 MR. WOLIN: And if counsel --
 18 could you clarify just for the record,
 19 are you representing both party Google
 20 and Mr. Srinivasan as an individual
 21 witness?
 22 MR. BITTON: Yeah. This is
 23 Daniel Bitton at Axinn on behalf of
 24 the witness and on behalf of Google.
 25 BY MR. WOLIN:

Page 5

1 R. SRINIVASAN
 2 Q. Mr. Srinivasan, I would like to
 3 start with some ground rules to help the
 4 deposition go smoothly.
 5 Have you ever been deposed before?
 6 A. I have not.
 7 Q. So I'm going to ask you a series
 8 of questions and I would just like you to
 9 answer them. Okay?
 10 A. Okay.
 11 Q. Our court reporter, Rebecca, will
 12 be recording everything we say today, so to
 13 assist her, please speak loudly and clearly.
 14 All right?
 15 A. Okay.
 16 Q. And please wait until I finish my
 17 question before you start your answer and I
 18 will wait until you finish your answer before
 19 I start another question. All right?
 20 A. Okay.
 21 Q. Please answer questions with a
 22 "yes" or "no" instead of nodding your head or
 23 saying "um-hum."
 24 Is that all right?
 25 A. Okay.

Page 10

1 R. SRINIVASAN

2 Q. I want to focus on the time when

3 you were employed by Google.

4 During your time while you were

5 employed by Google, am I correct that your

6 e-mail address was rahulsr@google.com?

7 A. That is correct.

8 Q. Did you ever -- was that -- sorry.

9 Was that your work e-mail address

10 the entire time you worked at Google?

11 A. That is correct.

12 Q. Did you ever use any other e-mail

13 addresses to conduct business during your

14 time at Google?

15 A. No.

16 Q. I want to just ask you this as a

17 "yes" or "no" question.

18 Prior to leaving Google, did you

19 ever receive an instruction to preserve

20 documents related to Google's digital

21 advertising business?

22 A. Yes.

23 Q. When did you receive that?

24 A. I do not recall the specific date.

25 Q. Do you recall what year?

Page 11

1 R. SRINIVASAN

2 A. I do not. I believe it was either

3 2019 or 2020, but I'm not -- I'm not

4 completely sure.

5 Q. Did you comply with that

6 instruction?

7 MR. BITTON: Objection to form.

8 A. I did.

9 Q. During the time you worked on

10 Google's digital advertising products, did

11 you use chats to communicate with your

12 co-workers at Google?

13 A. Yes.

14 Q. Have you ever used chats to

15 communicate with co-workers about any aspect

16 of Google's digital advertising business?

17 A. I believe I may have, yes.

18 Q. And when do you recall using chats

19 to communicate with co-workers about Google's

20 digital advertising business?

21 A. I do not recall specific

22 instances.

23 Q. Do you recall whether it was the

24 entire period you were employed at Google

25 working on digital advertising?

Page 12

1 R. SRINIVASAN

2 A. Likely, yes.

3 Q. Did you take steps to preserve

4 chats after receiving the instruction to

5 preserve documents related to Google's

6 digital advertising business?

7 MR. BITTON: Objection to form.

8 A. Yes.

9 Q. What steps did you take?

10 A. I would turn chat history on to

11 preserve the record of the chat.

12 Q. Could you tell me one way or the

13 other whether for every chat that related to

14 Google's digital advertising business, you

15 turned the history on?

16 MR. BITTON: Objection to form.

17 A. After receiving the Notice or the

18 guidance to preserve the record, I did turn

19 on chat history for all relevant

20 communications.

21 Q. Mr. Srinivasan, let's step back.

22 What is your educational

23 background?

24 A. I received a bachelors and masters

25 in computer science and an MBA.

Page 13

1 R. SRINIVASAN

2 Q. What year was your masters degree

3 in computer science?

4 A. 2011.

5 Q. And where did you receive that

6 degree?

7 A. IIT in Bombay.

8 Q. What year did you receive your

9 MBA?

10 A. 2016.

11 Q. Where was that?

12 A. At Harvard.

13 Q. And did you work in between

14 receiving your masters degree and starting at

15 Harvard?

16 A. I did.

17 Q. Where did you work?

18 A. I worked at BCG, Boston Consulting

19 Group, and at Blackstone.

20 Q. Did any of that work relate to

21 digital advertising?

22 A. No.

23 Q. After receiving your MBA, where

24 did you go to work?

25 A. Google.

Page 214

1 R. SRINIVASAN
2 caveats that I previously made, I
3 think we can wrap up today.
4 Thank you, Mr. Srinivasan. We
5 appreciate it.
6 THE WITNESS: Thank you.
7 THE VIDEOGRAPHER: The time is
8 3:13 p.m. We are off the record.
9 (Whereupon, at 3:13 p.m., the
10 Examination of this Witness was
11 concluded.)
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RAHUL SRINIVASAR

Subscribed and sworn to before me
this ____ day of _____, 2023.

NOTARY PUBLIC

Page 215

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|----|-----------------|-----------------------|------|
| 1 | E X H I B I T S | | |
| 2 | | | |
| 3 | | | |
| 4 | | | |
| 5 | EXHIBIT | EXHIBIT | PAGE |
| 6 | NUMBER | DESCRIPTION | |
| 7 | | | |
| 8 | Exhibit 1 | GOOG-AT-MDL-008612718 | 43 |
| 9 | | through '2735 | |
| 10 | Exhibit 2 | GOOG-DOJ-11788508 | 59 |
| 11 | Exhibit 3 | GOOG-AT-MDL-008961022 | 77 |
| 12 | | through '1024 | |
| 13 | Exhibit 4 | GOOG-DOJ-14395791 | 114 |
| 14 | | through '5797 | |
| 15 | Exhibit 5 | GOOG-DOJ-09704427 | 127 |
| 16 | | through '4428 | |
| 17 | Exhibit 6 | GOOG-DOJ-01019411 | 142 |
| 18 | | through '9419 | |
| 19 | Exhibit 7 | GOOG-DOJ-AT-01680260 | 156 |
| 20 | | through '0265 | |
| 21 | Exhibit 8 | GOOG-AT-MDL-007031286 | 163 |
| 22 | Exhibit 9 | DOJ GOOG-TEX-00101703 | 173 |
| 23 | | through '1710 | |
| 24 | Exhibit 10 | GOOG-DOJ-09713317 | 187 |
| 25 | | through '3323 | |

Page 216

| | | |
|----|----------------|---------------------------|
| 1 | | |
| 2 | Exhibit 11 | GOOG-DOJ-14572216 195 |
| 3 | | through '2217 |
| 4 | Exhibit 12 | GOOG-AT-MDL-004151779 201 |
| 5 | | through '1792 |
| 6 | Exhibit 13 | GOOG-AT-MDL-004586335 208 |
| 7 | | through '6345 (clawed |
| 8 | | back) |
| 9 | | |
| 10 | | |
| 11 | | |
| 12 | I N D E X | |
| 13 | | |
| 14 | EXAMINATION BY | PAGE |
| 15 | MR. WOLIN | 3 |
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Page 217

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2 C E R T I F I C A T E

3

4 STATE OF NEW YORK)

5 : SS.:

6

7 I, REBECCA SCHAUMLOFFEL, a Notary

8 Public for and within the State of New York,

9 do hereby certify:

10 That the witness whose examination

11 is hereinbefore set forth was duly sworn and

12 that such examination is a true record of the

13 testimony given by that witness.

14 I further certify that I am not

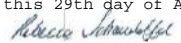
15 related to any of the parties to this action

16 by blood or by marriage and that I am in no

17 way interested in the outcome of this matter.

18 IN WITNESS WHEREOF, I have hereunto

19 set my hand this 29th day of August, 2023.

20 

21 REBECCA SCHAUMLOFFEL

22

23

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